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# In the Drawings

Please replace the originally filed drawings [FIGS. 1A-4] with the replacement formal drawing sheets attached as Exhibit A to this response. Exhibit A includes a complete set of replacement formal drawing sheets [FIGS. 1A-4] for this application. The replacement formal drawing sheets contain no new matter.

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#### **REMARKS**

In response to the Office Action mailed December 15, 2005, Applicants respectfully request reconsideration. Claims 1 to 20 are pending in the application with claims 1, 7, 8, 15 and 16 being in independent form. The claims as presented are believed to be in allowable condition.

## Replacement Drawings

As indicated in the drawings section above, please replace the drawings as filed with the enclosed replacement formal drawings.

#### Election/Restriction

In the Office Action, claims 16-20 have been withdrawn from consideration as being elected to a non-elected invention. Specifically, the Examiner has indicated that claims 16-20, which are directed to a method of coupling a plurality of external wires to an uninterruptible power supply, can be used to interconnect external wires to other electrical devices rather than the recited uninterruptible power supply. Applicants would like to direct the Examiner's attention to independent claim 16 (from which claims 17-20 depend), which specifically recites "inserting the common tray into an opening in the *uninterruptible power supply* such that each of the external wires is electrically coupled to a corresponding wire in the uninterruptible power supply." Claim 16 is clearly directed for use with an uninterruptible power supply, and Applicants respectfully request that the Examiner reconsider the requirement to withdraw these claims from consideration.

#### Allowable Subject Matter

Claims 7 and 15 have been indicated as allowable.

### Claim Rejections

Claims 1, 4, 5, 6, 8, 10 and 12-14 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Admitted Prior Art (APA) in view of Brown (U.S. Patent No. 4,595,248) and Molus (U.S. Patent No. 6,511,328).

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Claim 1 is directed to a terminal block for use in an uninterruptible power supply. The terminal block includes a first portion comprising a plurality of stalls, each of the plurality of stalls having an aperture, and at least one socket positioned in the aperture, the at least one socket arranged to accept a wire from internal portions of the uninterruptible power supply. The terminal block further includes a second portion removably connectable to the first portion, the second portion comprising a plurality of stalls, a plurality of electrical ports, an electrical port positioned in each of the plurality of stalls, and at least one connector pin positioned within one of the plurality of stalls to connect to the at least one socket through the aperture.

With regard to independent claims 1 and 8, the Office Action briefly discusses the uninterruptible power supply described in the background of the invention and discusses the disclosures of Brown and Molus. The Office Action then states that it would have been obvious to provide the APA uninterruptible power supply with the claimed terminal block and sockets connected to wires external and internal, respectively, of the power supply in view of the teachings of Brown and Molus. The Office Action further states that the first portion of Brown lacks a plurality of stalls, but discloses a plurality of stalls for his second portion, and that it would have been obvious to include stalls in the first portion of Brown. As will now be discussed, Applicants respectfully disagree that it would have been obvious to modify the terminal block of Brown as suggested.

To establish a prima facie case of obviousness, there must be some suggestion or motivation in the references themselves or in the knowledge generally available to one of skill in the art to modify the reference (see, MPEP §§2142, 2143). In the present case, there would have been no motivation to one of ordinary skill in the art to modify the disclosure of Brown as suggested in the Office Action to include stalls in the first portion. Accordingly, the Office Action has not established a prima facie case of obviousness. In Brown, base contacts 26 (referred to in the Office Action as sockets) are installed in a base block 20 made of insulating material (col. 2, lines 58-59). There would have been no motivation to one of skill in the art to add stalls to the base block 20, as there would have been no apparent reason to do so.

With regard to the combination of APA, Brown, and Molus, it is not clear how Brown is being combined with Molus and what the resulting combination would be. The Office Action

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states that Molus discloses that it is known to connect sockets 60 of his PLC to wires of cable 28. In Molus, reference numeral 60 is an external connector (see col. 4, lines 9 and 10) that is electrically coupled to a second circuit board 70 (see col. 4, lines 50-52). It is not clear from the Office Action how the connector 60 would be combined with any apparatus disclosed in Brown. If the rejection of the claims is to be maintained, Applicants respectfully request that the resulting combination, and motivation for the combination, be further described. If the Examiner believes that it would be helpful, the undersigned Applicants' Attorney is willing to participate in a telephone interview with the Examiner to discuss the combination further.

Based on the foregoing, the rejection of claim 1 under 35 U.S.C. §103 should be withdrawn.

Claims 2-6 depend from claim 1 and are patentable for at least the same reasons. Further, the Office Action has not specifically addressed the limitations contained in claims 4-6. If the rejection of any of claims 4-6 is to be maintained, Applicants respectfully request that the limitations of claims 4-6 be addressed.

Independent claim 8 is directed to a terminal block for use in making electrical connections in an uninterruptible power supply. The terminal block includes a first portion having a plurality of stalls, each of the plurality of stalls including an aperture to accept a wire from an internal portion of the uninterruptible power supply, and a second portion having a plurality of stalls, each of the plurality of stalls including an electrical port for accepting electrical connections from at least one device. The terminal block further includes connecting means for connecting the first portion to the second portion, the connecting means including at least one connector inserted into a first side of the aperture and at least one socket inserted into a second side of the aperture.

The rejection of claim 8 should be withdrawn for reasons similar to claim 1 discussed above.

Claims 9-14 depend from claim 8 and are patentable for at least the same reasons. Further, the Office Action has not specifically addressed the limitations contained in claims 9-14. If the rejection of any of claims 9-14 is to be maintained, Applicants respectfully request that the limitations of claims 9-14 be addressed.

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Claims 2, 3, 9 and 11 have been rejected under 35 U.S.C. 103(a) as being unpatentable over APA in view of Brown and Molus and further in view of Bernat (U.S. Patent No. 6,773,285).

Each of these claims depends from one of claims 1 and 8 and is patentable for at least the same reasons.

### **CONCLUSION**

Based on the foregoing, the application is believed to be in allowable condition and a notice to that effect is respectfully requested. If the Examiner has any questions regarding the application, he is invited to contact the Applicant's Attorney at the number provided below.

Respectfully submitted,

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Dated: May 15, 2005

Attorney Docket No.: A2000-701319

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